

EXHIBIT E

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 - - - - - x

5 216 JAMAICA AVENUE, LLC,

6 Plaintiff,

7 - against -

8 S & R PLAYHOUSE REALTY CO.,

9 Defendant.

10 - - - - - x

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12

13

December 15, 2006

14

9:30 a.m.

15

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Volume II

17

18 CONTINUED DEPOSITION of STUART VENNER, taken
19 by the attorney for the Defendant, pursuant to
20 Notice, held at 335 Madison Avenue, New York,
21 New York, before Michael Catania, a Notary Public
22 of the State of New York.

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* * * *

25

1 S. Venner

2 blend together. Halle Cleveland, LLC.

3 Q. When you purchased the Halle
4 Building, the real estate which is the subject
5 of this action, were you provided with a file by
6 your predecessor?

7 A. No.

8 Q. What documents did you receive from
9 your predecessor?

10 A. Only -- really nothing. We
11 received -- the assignment. The lease we
12 received.

13 There were a couple of amendments to
14 the lease from 1929. That was it, I think.
15 That was it.

16 I mean, we provided everything. It
17 was the lease, the assignment, a couple of
18 amendments.

19 Q. Were you completely satisfied with
20 the documents that were provided to you by your
21 predecessor?

22 A. Yes.

23 Q. Did you ever at any time ask your
24 predecessor or anyone else to provide you with
25 further documentation?